

Amateur Radio Station W3IRE

9436 Howes Road
Address Line 2
Dunkirk, MD 20754
U.S.A.

Home Phone 410-251-9411
Email w3ire7@chesapeake.net

RECEIVED
OCT 19 1998
FCC MAIL ROOM

October 09, 1998

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D. C. 20037

Enclosed is my reply and comments to the following document:

Notice of Proposed Rule Making
FCC WT Docket 98-143
Release date August 10, 1998
Amendment of Part 97 of Commission's Amateur Service Rules

As noted above I can be contacted by telephone, E-Mail or at the Mail address if additional information or questions are required.

Sincerely,

Gail D. Griner

No. of Copies rec'd
List ABCDE

024

RECEIVED

JUL 1 9 10 98

FEDERAL COMMUNICATIONS COMMISSION
WT Docket No. 98-143

RE: Notice of Proposed Rule Making
Release Date August 10, 1998

From....Gail D. Griner W3IRE
9436 Howes Road
Dunkirk, Maryland 20754
Amateur Operator License Class---Extra
Licensed since October, 1931
Broadcast Station Owner/Operator---3 AM Stations
Communications Experience---14 years
Electronic Equip. Manufacture Experience---34 Years

I have read the subject Notice of Proposed Rule Making and wish to reply and give what I believe is data pertinent to the general conditions that exist today, relative to the Licensed Amateur Radio community.

My comments are based on the premise that:

(1) Morse Code requirements will change to accommodate the present day conditions.

(2) Major change is needed in the license examinations to truly test for an applicants knowledge of good operating practices to insure full compliance of the FCC rules and regulations as well as the proper technical operation of transmitting equipment.

(3) Change is Needed to Simplify and Improve License Class Structure by reducing number of Basic License Classes to three.

Generally, I agree with the proposed changes and comments in NPRM 98-143 relative to the following and no further comment on these matters will be made in this document:

(1) ELIMINATION of the RACES LICENSES

(2) VE PARTICIPATION IN THE EXAMINATION PROCESS

(3) DISMISSING the repetitive petitions that are filed with the FCC.

SUGGESTED CHANGES IN AMATEUR RADIO REGULATIONS

Major restructuring in any part of the regulations must be done with very thoughtful planning AND ANALYZING of what an action will do to the present licensed group, as well as its effect on the future of Amateur Radio.

MORSE CODE COMMENTS:

The simple change to reduce Morse Code test speed is NOT THE ANSWER. As with all large groups of people in any part of today's society, Amateur Radio is populated with persons having all types of human characteristics and in our FREE COUNTRY expect equal consideration and treatment. The Morse Code issue has created a very emotional situation and will be the most difficult one to settle without causing damage to the FCC reputation for fair treatment.

PROPOSED MORSE CODE & LICENSE CLASS CHANGES

Create three BASIC license classes that require NO MORSE CODE examination. These would be equivalent to the present NOVICE/TECHNICIAN, GENERAL/ADVANCED and EXTRA with ONLY PHONE/DIGITAL privileges. In this document they will be designated as Class C, Class B and Class A, respectively. To qualify for MORSE CODE PRIVILEGES, a MORSE CODE ENDORSEMENT would be required.

JUSTIFICATION

Refer to Appendix A outlining the changes that have taken place in Amateur Radio. Also, see the later paragraphs for details on the proposed three basic license classes.

It appears that ■On The Air■ operation of a Radio Station attracts as many or perhaps more persons to Amateur Radio than the Technical aspects. In paragraph 9 of the NPRM the FCC states the Amateur Radio Service rules are designed to ■IMPROVE OPERATOR SKILLS, ENHANCE INTERNATIONAL GOODWILL, AND EXPAND THE NUMBER OF TRAINED OPERATORS, technicians and electronic experts.■ The proposed changes contained in this document should help meet this objective. Considering the present day technology and the mix (and attitude) of Licensee's, the most practical approach would be to create license classes that provide equal opportunity for both Technical and Operator groups to enjoy the privileges granted to Licensed Amateur Radio Operators.

The TECHNICIAN/OPERATOR license difference would be handled by the endorsement procedure, similar to the CW endorsement.

TECHNICIAN CLASS COMMENTS.

PROPOSAL.

Establish three basic license classes with no Morse code.

Test for FCC Rules, Operation Procedures and Technical Knowledge.

JUSTIFICATION.

The BASIC Class A, Class B, Class C license examinations would test for knowledge of FCC Rules, Receiver/Transmitter operation and Technical ability to service, repair and adjust Amateur Radio equipment.

Publishing of the examination questions would be eliminated, to change the present testing from a memory type test to a true knowledge test. If this is accomplished, it will eliminate the strong opposition to NO-CODE licensing. Many feel with the present testing the MORSE CODE requirement is needed to act as a limited "filter" to prevent "unqualified persons" from being licensed. Test questions should be comprehensive enough to meet the aforementioned objectives, but, not beyond the scope needed to adequately handle the technical situations involved in today's Amateur Radio environment. Full understanding of how unintentional interference is caused and proper operating practices when interference occurs, including proper conduct under these and other unusual conditions.

The privileges granted to the Class A Technicians would be the same as the current EXTRA class licensee's, minus the CW privileges. Class B would grant what is given to the current combined General/Advanced licensee's, again minus the CW privileges. Class C would be granted the current Novice/Technician privileges, minus the CW privileges.

OPERATOR CLASS COMMENTS.

PROPOSAL.

The same three basic license classes would be used as designated in the Technician License proposal.

Test for FCC Rules, Operating Procedure and Equipment Operation.

JUSTIFICATION

The Operator Classes would be the same as the Technician Classes except for the license examinations. Since it must be assumed the applicant has no technical knowledge, the examination process must be extensive enough to show complete knowledge of FCC Rules, Good «on the air» operating practice and proper operation of the equipment that will be used in the proposed station. Full understanding of how unintentional interference is caused and proper operating practices when interference occurs, including proper conduct under these and other unusual conditions.

As with the Technician testing, no publishing of the question pool will be allowed. The requirement to be properly trained in the operation of the transmitting equipment used would be handled by the endorsement procedure, with the endorsement being made by a licensed technician class person, signing the back of the license. The Operator Class Licensee would not be allowed to make changes to the transmitting equipment unless it was done under the direction of a Technician Class licensee. No technical theory testing would be given other than what is needed to understand the proper operation of the equipment being used in the proposed station, I.E., SWR, Power output, ETC.

MORSE CODE ENDORSEMENTS

PROPOSAL

Test for ability to send and receive Morse code.

JUSTIFICATION

A new license applicant or a person holding a valid license desiring to take advantage of the available MORSE CODE privileges would be tested for their ability to SEND AND RECEIVE Morse code as applicable for the appropriate license class. A definite testing procedure should be established, such as the former one minute solid copy out of five minutes sent. The present system is subject to many variables and is to vulnerable to the «whim of the VE». A short written examination would be given testing for knowledge of the frequencies, rules and procedures applicable.

The current Morse Code speeds should be maintained as they provide an incentive to upgrade and have a very high approval rating AMONG THE PERSONS INTERESTED IN MORSE CODE OPERATION.

FCC COMMENTS.

It is important to seriously consider the impact that will result from changes imposed on the Amateur Radio Community. No presently licensed person should lose privileges.

It seems prudent to «Grandfather» current licensee's to the equivalent new license class with Technician and Morse Code Endorsements.

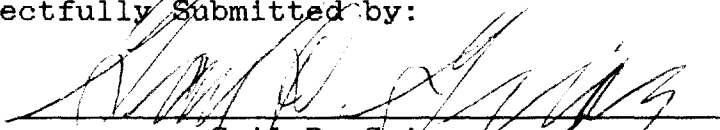
For the foreseeable future the FCC will be overburdened with work and problems in other parts of the communications world to properly enforce Amateur Radio regulations. The NPRM indicates the FCC is looking to the Amateur Radio community for suggestions to the enforcement and Morse code issues. For this, the FCC should be complimented.

Any effective resolution to the enforcement problem will require major changes in the present system, especially in the legal area. The FCC is correct is asking the Amateur community for suggestions. Everyone involved should move away from the past and present day concept of Amateur Radio law enforcement. A way must be found to permit a volunteer's participation in the enforcement of regulations. Monitoring, Identification (of illegal station operation), Notice of violation and other enforcement functions. Of course, strict guidelines would have to be established. Time constraints indicate it does not appear feasible to implement this type of change as part of the NPRM action.

With a well planned and computerized system, the workload imposed on the FCC should be reduced by the implementation of the suggestions contained in this document. If electronic filing is used (by VE's), all data entries would essentially be automatic.

The implementation of the proposals contained in this document gives a fair and balanced set of regulations for all the diverse groups that make up the Amateur community.

Respectfully Submitted by:


Gail D. Griner

Dated this 9th day of October, 1998.

APPENDIX A.

EVOLUTION OF AMATEUR RADIO CHANGES

If history is analyzed, it shows a subtle change has taken place. Contrary to the present day popular opinion, Amateur Radio NEVER WAS A 100% technically oriented group. Yes, in the early days (1930's) most every one had homemade transmitters and receivers. Most tried to built their equipment. Most of the equipment built were exact carbon copies of units fully illustrated in QST and various other magazines. Even then many needed extensive help to get on the air. All the Doctors, Lawyers, Clergy, Politicians, etc., were not expert technicians. However, it did give them exposure to the technical aspect and most developed a keen perception of the need to operate their equipment correctly. Starting in the early 1950's a greater number of licensed hams began buying transmitters and receivers. In the foreground was Heathkit (and a few other Kit suppliers) that gave new and old timers a sense of pride in building excellent performing transmitters and receivers. This gave the less technical person exposure to the technical portion of Amateur Radio. For many it was the spark that lead them into the technical and engineering fields.

During this same 1930/1950 time period the percentage of hams that chose to make their avocation in the Engineering or Technician fields was no where near 100%, probably no higher than today's. What has happened is a very important shift in today's Amateur Radio Operator "mind set" as compared to the 1930/1950 group. Back then Radio Communications was a relatively new science and most everything centered around the technical aspect, with Operating being the final test for all the new ideas that were surfacing. (the word "Electronics" had not been invented). Very few Awards and Contests were available. Except for a sudden devastating disaster, no public service events were available. At an ever increasing pace, fantastic developments occurred in the Communications and Electronic fields eliminating the need for a person interested in only the operating aspect to get involved in the technical portion. As with other two way communications services the developments made technical knowledge unnecessary to operate a Amateur Radio Station.

These technical developments caused Amateur Radio to evolve into a two dimensional group. There still exists the group that have the technical interests and most of their desires and reason for staying with Amateur Radio is technical. The second group is strictly for the SOCIAL and PERSONAL

enjoyment of on the air operating. This should be viewed as a plus factor as good on the air operating is just as important to the Amateur Service as good technician and engineers. Of course, many of the first group enjoy the operating aspect and spend considerable time chasing DX, Contesting, Public Service, etc. Few of the second group spend any time on the technical end of things. Some by way of association, have the technical spark ignited and become technicians. Both groups have high participation in Public Service and Disaster functions. Both groups should be treated on an equal basis.